

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Todd **KREISLER**,

Plaintiff,

v.

Kais ABID,

d/b/a PAPA JOHN'S;

KAM FOUR INC,

A New York Corporation d/b/a/ Papa John's,

PARKER EAST 24TH APARTMENTS LLC,

A New York Limited Liability Company;

PARKER COMMERCIAL 24TH ASSOCIATES,

A New York Limited Partnership,

305 EAST 24TH OWNERS CORP.,

A New York Corporation

Defendants.

12 civ. 4052 (PAE)

FRE 702(A) MOTION

Notice of Motion

TO: Adam Shore, Esq.
Gary Ehrlich, Esq.
John Egan, Esq.

Via ECF filing

PLEASE TAKE NOTICE that upon the attached Attorney Declaration of Barry N. Frank, Esq. and the attached Motion, Defendant will move this Court, Hon. Paul A. Engelmayer, U.S.D.J. in Room_____ United States Courthouse, 500 Pearl Street, New York, New York 1007- as soon as counsel can be heard, preclusion of testimony by Michael Tobias, and all further relief deemed appropriate by the Court.

Dated: Fort Lee, New Jersey
March 25, 2013

Law Firm of Barry N. Frank & Associates PC
Attorneys for the Defendant, Kais Abid

BY: _____/s/ Barry N. Frank, Esq.
440 West Street, 3rd Floor
Fort Lee, New Jersey 07024-5028
(201) 461-2500